



October 4, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: *Notice of Ex Parte Meeting – GPS Innovation Alliance: Amendment of Rules
Governing Ultra-Wideband Devices RM - 11844***

Dear Ms. Dortch:

On October 2, 2019, members of the GPS Innovation Alliance (“GPSIA”) met with staff of the Commission’s Office of Engineering and Technology (“OET”) to discuss the protections afforded by the existing ultrawideband (“UWB”) rules to the Global Positioning System (“GPS”) and the substantial risk of interference to GPS if the existing UWB rules were revised as contemplated by the Petition for Rulemaking submitted by Robert Bosch LLC. (the “Petition.”) The GPSIA members and the Commission staff participating in the meeting are listed on Attachment A.

During the meeting, we highlighted GPSIA’s support for innovation and efficient use of spectrum but reiterated concerns outlined in GPSIA’s comments and reply comments on the Petition. In particular, we discussed GPSIA’s view that the rule changes proposed in the Petition would eliminate important interference protections for GPS that were developed as a result of a rigorous public process that included extensive technical studies and analyses. The Petition does not provide sufficient facts, data or analysis to justify a substantial revision of the rules and does not adequately address how interference to GPS would be mitigated. We further explained that the Commission need not launch a rulemaking to change the U.S. UWB rules in order to “harmonize” U.S. rules with European rules and standards under discussion.

GPSIA pointed out that the UWB rules are working as intended to prevent increases in the noise floor and interference to existing users. Proposed UWB uses that

October 4, 2019
Page 2

cannot meet the emissions or other existing UWB technical and operational rules have been fairly considered in a public waiver process that has enabled nonconforming uses to proceed under Commission-specified conditions that limit the potential for interference. We reiterated GPSIA's stance that waiver applicants must provide adequate data, testing, and analysis to support their requested waivers.

For the reasons discussed, GPSIA does not support commencing a proceeding that would substantially change existing rules. To the extent you have questions or concerns, please feel free to contact the undersigned.

Respectfully submitted,

/s/ J. David Grossman
J. David Grossman
Executive Director
GPS Innovation Alliance
1800 M Street, NW
Suite 800N
Washington, DC 20036
202-628-9586

Dated: October 4, 2019

cc (via email): See Attachment

ATTACHMENT A

GPS Innovation Alliance (GPSIA)

David Grossman, Executive Director of GPSIA

Mark Rentz, Senior Systems Engineer (Deere & Company)

Kurt Zimmerman, Engineering Director (Trimble, Inc.) (by telephone)

Ann Ciganer, Vice President Strategic Policy (Trimble, Inc.) (by telephone)

Bronson Hokuf, Engineer (Garmin International, Inc.) (by telephone)

Dave Kight, In-House Counsel (Garmin International, Inc.) (by telephone)

Morgan, Lewis & Bockius LLP – Counsel to Deere & Company

Catherine Wang

Tim Bransford

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. – Counsel to Trimble

Russell Fox

Wilkinson Barker Knauer LLP – Counsel to Garmin International

M. Anne Swanson

FCC Attendees from Office of Engineering and Technology

Julius Knapp, Chief Engineer

Michael Ha, Chief (Policy and Rules Division)

Karen Rackley, Chief (Technical Rules Branch)

Paul Murray, Associate Chief (Legal)

Aspasia Paroutsas, Chief of Staff

Jamison Prime, Associate Chief (Legal)

Ira Keltz, Deputy Chief

Martin Doczkat, Chief (Electromagnetic Compatibility Division)

Gulmira Mustapaeva, Engineer